

THE LAW OFFICES OF

Richman Hill & Associates PLLC

2027 Williamsbridge Road, Bronx, NY 10461

718.892.8588 | fax: 718.518.0674

Stacey Richman, Esq.

srichmanlaw@msn.com

Renée C. Hill, Esq.

rhillsq@msn.com

June 30, 2023

The Honorable John G. Koeltl

United States District Court

500 Pearl Street

New York, New York 10007

VIA ECF

RE: United States v. John Campanella

Indictment No. S1 22 CR 212 (JGK)

Request For Alterations In Bail Conditions

Your Honor:

I write at the suggestion and continued endorsement of Pre-Trial, but with the opposition of the Government.

Mr. Campanella reported as directed to Pre-Trial Services immediately after his sentencing on June 27, 2023.

That afternoon, Intensive Supervision Specialist Ashley Cosme wrote to counsel and the Government inquiring if the parties would be in agreement to a strict curfew set by PreTrial Services. "...Being that the defendant has remained in full compliance and is awaiting his surrender date, would the parties be in agreement to a strict curfew set [b]y Pretrial Services? The defendant has been on home detention since his release on bail and has remained employed the entire time. Based on his compliance, we feel that a curfew would be more appropriate as opposed to home detention." See, Email of June 27, 2023 3:52:20 p.m., from Pretrial Officer Ashley Cosme, attached. Counsel for Mr. Campanella endorsed this suggestion.

The Government objected "for the reasons articulated in [the Government's] prior emails and filings. We believe the current conditions should remain in place through his surrender." See, Email of June 27, 2023 4:31 p.m. from AUSA Celia Cohen, attached.

Counsel thereafter inquired if she should write to the Court.

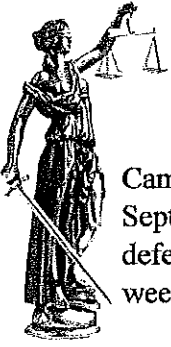
Pre-trial responded: "Thank you both for your responses.

"Stacey, Pretrial still stands by our position. Based on the factors we consider, we believe a curfew is appropriate at this time. Please advise if you intend to write to the court." See, Email of June 28, 2023 7:39 a.m., from Pretrial Officer Ashely Cosme, attached.

The Court approves Pre-Trial recommendation for a curfew rather than home detention until surrender date. So ordered.
7/5/23 *[Signature]*
U.S.D.C.


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As a back up suggestion, also endorsed by Pretial, perhaps the Court would allow Mr. Campanella to spend some extra time outdoors with his children before surrendering in September. If the court does not approve a curfew as set by Pretrial, Pretrial would allow the defendant out for a four hour window each day. This would include weekdays after work and weekend.

We look forward to the direction of the Court.

Most respectfully,

Stacey Richman

cc:

AUSA Celia Cohen, via email: Celia.cohen@usdoj.gov and ECF

AUSA Rushmi Bhaskaran, via email: Rushmi.Bhaskaran@usdoj.gov and ECF

AUSA Justin Rodriguez, via email: Justin.Rodriguez@usdoj.gov and ECF

USPO Ashely Cosme, via email: Ashley_Cosme@nyspt.uscourts.gov and ECF